

EXHIBIT G



ZACHARY W. CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

SUZANNA PUBLICKER METTHAM
Senior Counsel
smettham@law.nyc.gov
(212) 356-2356

October 10, 2018

BY FIRST-CLASS MAIL & E-MAIL (W/O ATTACHMENTS)

Michael N. David, Esq.
Attorney for Plaintiff
14 Wall Street, 20th Floor
New York, NY 10005

Re: Doe v. City of New York, et al., 18 Civ. 670 (ARR)(JO)

Counselor:

In accordance with the continuing discovery obligations of Defendants City and Gregory Markov (hereinafter "City Defendants"), pursuant to Fed. R. Civ. P. 26(a)(1) and 26(e), City Defendants identify the additions to their Responses to Plaintiff's First Set of Interrogatories and Document Requests:

1. IAB Resume for co-defendant Richard Hall, bearing Bates Nos. D000001-D000005;
2. IAB Resume for co-defendant Eddie Martins, bearing Bates Nos. D000006-D000018;
3. IAB Resume for defendant Gregory Markov, bearing Bates Nos. D000019-D000026;
4. Central Personnel Index for co-defendant Richard Hall, bearing Bates Nos. D000027-D000027;
5. Central Personnel Index for co-defendant Eddie Martins, bearing Bates Nos. D000028-D000031;
6. Central Personnel Index for defendant Gregory Markov, bearing Bates Nos. D000032-D000035;
7. CCRB History for co-defendant Richard Hall, bearing Bates Nos. D000036-D000036;
8. CCRB History for co-defendant Eddie Martins, bearing Bates Nos. D000037-D000038;
9. CCRB History for defendant Gregory Markov, bearing Bates Nos. D000039-D000040;

10. NYPD Performance Evaluations for 2007 through 2017 for co-defendant Eddie Martins, bearing Bates Nos. D000041-D000063;
11. NYPD Performance Evaluations for 2010 through 2017 for co-defendant Richard Hall, bearing Bates Nos. D000064-D000104;
12. NYPD Performance Evaluations for 2007 through 2017 for defendant Gregory Markov, bearing Bates Nos. D000105-D000137;
13. NYPD Personnel File for co-defendant Eddie Martins, bearing Bates Nos. D000138-D000272;
14. NYPD Personnel File for co-defendant Richard Hall, bearing Bates Nos. D000273-D000439;
15. NYPD Personnel File for defendant Gregory Markov, bearing Bates Nos. D000440-D000583;
16. Relevant Memo Book Entries for Lt. Abbriano, bearing Bates Nos. D000584-D000587;
17. Relevant Memo Book Entries for defendant Gregory Markov, bearing Bates Nos. D000588-D000591;
18. Relevant Memo Book Entries for Sgt. Espey, bearing Bates Nos. D000592-D000594;
19. Text Messages Exchanged on September 15, 2017, bearing Bates Nos. D000595-D000625;
20. NYPD Arrest Report for co-defendant Eddie Martins, bearing Bates Nos. D000626-D000628;
21. NYPD Arrest Report for co-defendant Richard Hall, bearing Bates Nos. D000629-D000631;
22. NYPD Online Prisoner Lookup ("OLPA") for co-defendant Eddie Martins, bearing Bates Nos. D000632-D000633;
23. NYPD Online Prisoner Lookup ("OLPA") for co-defendant Richard Hall, bearing Bates Nos. D000634-D000635;
24. Transcript of Plaintiff's 50-H Hearings, bearing Bates Nos. D000636-D001376;
25. Notices of Claim filed by Plaintiff with the NYC Comptroller, bearing Bates Nos. D001377-D001382; and
26. Brooklyn South Narcotics Roll Call for September 15, 2017, bearing Bates Nos. D001383-D001386.

City Defendants designate documents bearing Bates Nos. D000001-D000625 as Attorneys' Eyes Only Confidential pursuant to paragraphs 4(a), 4(b), and 4(c) of the Confidentiality Order and Stipulation are so-ordered by the Hon. James Orenstein on October 3, 2018. Due to security concerns, the Attorneys' Eyes Only Confidential Production PDF file is password protected. The password to open the file is: [REDACTED]

Please note that in accordance with the Court's Order dated October 3, 2018, City Defendants have produced only information reflecting substantiated and unsubstantiated allegations of a similar nature to those alleged against each individual in the complaint (sexual misconduct, excessive force, and false arrest allegations against Defendants Martins and Hall, and allegations of failing to make or take a report against Defendant Markov) and allegations impacting on truthfulness, if any made to the NYPD and/or the CCRB. Any allegation not fitting this description has been redacted. Additionally, please see attached for a privilege log regarding information redacted on the basis of privilege.

Very truly yours,

/s/

Suzanna Publicker Mettham
Senior Counsel

Enc.

cc: *By First Class Mail & E-mail (w/o Attachments)*
Law Offices of Patrick C. Carroll
Attorney for Defendants Richard Hall and Eddie Martins
One Old Country Road, Suite 125
Carle Place, New York 11514